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State of Kansas . . . John Carlin, Governor

DEPARTMENT OF HEALTH AND ENVIRONMENT

Barbara J. Sabol, Secretary

Forbes Field  
Topeka, Kansas 66620-0110  
913-862-9360



September 10, 1986

William Dame  
Plant Manager  
Olin Water Services  
3155 Fiberglass Road  
Kansas City, Kansas 66115

Re: Hazardous Waste Compliance Inspection  
EPA Identification Number KSD000203638

Dear Mr. Dame:

On July 29, 1986, a hazardous waste compliance inspection of your facility was conducted by this department to determine compliance with state and federal regulations concerning hazardous waste.

A review of our files revealed that Olin Water Services-Olin Corporation generates hazardous waste from the preparation of liquid and powder water treatment formulations. These wastes are identified by the following waste codes:

D001-Solid waste which exhibits the characteristics of Ignitability  
D002-Solid waste which exhibits the characteristics of Corrosivity  
D003-Solid waste which exhibits the characteristics of Reactivity  
D007-Solid waste that exhibits the characteristics of EP Toxicity for chromium  
Various U-Listed chemicals.

In addition to being a generator, Olin Water Services has a hazardous waste storage permit. Your facility is, therefore, subject to the requirements of 40 CFR, Parts 260 to 264, 270, and 124 and the specific conditions of Permit Number KSD000203638.

The inspection identified the following items not in compliance with state and federal regulations concerning generators of hazardous waste and the permit requirements for your storage facility.

1. Each container or tank must be marked clearly with the words "Hazardous Waste" in accordance with 40 CFR, Part 262.34.

On the day of our inspection, several containers holding hazardous waste (both 5 gallon cans and one 55 gallon drum), in the laboratories, did not have the words "Hazardous Waste" on them.

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USEPA, RCRA Branch

2. Personnel training documents must include records of training given to facility personnel in accordance with 40 CFR, Part 264.16(d) and Permit Number KSD000203638.

The inspection revealed that documentation was inadequate to substantiate that training was being conducted as outlined in your permit.

3. The owner or operator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of the facility in an emergency as outlined in 40 CFR, Part 264.35.

On the day of the inspection, containers were stored around the emergency eye wash station in the C/F mix room so that it was impossible for personnel to access the eye wash station in an emergency. In addition, the emergency eye wash basin was used for storage of miscellaneous items.

4. The permittee must inspect the facility per the inspection schedule and record inspections in an inspection log as outlined in your permit number KSD000203638.

It was noted that the inspection log being used at your facility is different than the one in your permit application. A copy of this revised log must be submitted to our department. This revision is considered to be a minor modification of your permit and will not require public notice and comment.

In addition, the inspection schedule outlined in your permit is not being followed. The permit indicates that the containers, containment system and aisle space will be inspected daily. These items are inspected weekly. The permit indicates that the emergency equipment will be inspected weekly. The equipment is inspected monthly.

5. It shall be unlawful for any person to store, collect, treat or dispose of hazardous waste contrary to the rules and regulations, standards or orders of the Secretary as outlined in K.S.A. 65-3441.

On the day of the inspection, liquid from the VSR sump was being discharged out on the ground. A sample obtained from this liquid revealed this material was a hazardous waste due to the concentration of chromium. A copy of this analysis is attached.

The above listed deficiencies should be corrected by October 15, 1986. Please notify our department when these deficiencies have been corrected.

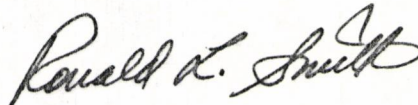
As a result of these violations, further enforcement action may be pending against your facility. Notice of any further enforcement action will be addressed in separate correspondence.



In addition, it was noted during the inspection that you were storing outdated lab chemicals in the lab supply room at your facility. The chemicals observed were not hazardous wastes. However, you should keep in mind, that if you need to dispose of any U or P listed lab chemicals in the future, these wastes are hazardous wastes and will need to be properly stored and labeled.

Your cooperation with the hazardous waste management program is appreciated. If you have questions concerning the inspection, please call me at (913) 862-9360, extension 324.

Sincerely,



Ronald L. Smith  
Inspections and Enforcement Section  
Bureau of Waste Management

RLS:cr/WM/X8

cc: Thomas Gross ✓  
John Paul Goetz  
Northeast District Office  
L.M. Prouty